



**Trade Waste Incineration**

7 Mobile Avenue  
Sauget, IL 62201-1069  
618/271-2804

May 13, 1992

Mr. William Child,  
Bureau Chief  
Bureau of Land  
Illinois Environmental  
Protection Agency  
2200 Churchill Road  
Springfield, IL 62706

Re: Trade Waste Incineration  
ILD 098642424  
Notice of Noncompliance  
Consent Decree No. 91-CH529  
Section IV.X  
Incinerator #2  
Automatic Waste Feed Cut-Off Conditions

M.G. Copy  
Scott P  
Bill I  
Bill R  
Larry E  
Glen S  
APC

File Original

1631910009 / St. Clair Co.  
Sauget / TWI Incinerator  
~~REHA~~ Compliance

Dear Mr. Child:

As required by Section IV.X, Notice of Noncompliance, Trade Waste Incineration (TWI) is reporting that an Automatic Waste Feed Condition failure occurred at Incinerator #2.

On April 29, 1992, the automatic waste feed cutoff system for CO greater than 500 ppm for one minute average failed. The following are the details of this event.

On April 29, 1992 at 12:47:30, the one minute CO average reported 558 ppm. The operator at Incinerator #2 noticed this occurrence but he did not get a waste feed shutdown alarm.

The operator verified the event, but by that time - 12:48:30 the CO - one minute average was 380 ppm. The operator contacted the appropriate supervisor and shut down all waste feeds at 12:57:30. The supervisor of the unit along with the electrical engineer investigated the event and found that a PLC programming error resulted in the feeds not automatically shutting down when the CO exceeded 500 ppm. The PLC logic was missing a connection to the output error. This error was immediately corrected.

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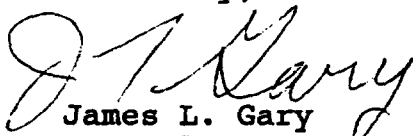
Page 2.  
Mr. Child

Before Incinerator #2 was started back up, the PLC logic was verified to ensure all the other automatic waste feed cutoff conditions were in place and operational. TWI continues to conduct bi-weekly waste feed shutdown checks which verify that the output coils are functioning, but it does not check the PLC logic. The PLC logic for automatic Waste Feed Cutoff's has been verified at Incineration #2 and #3. The CO event on Incinerator #2 was the first event since the new Operating and AWFC conditions became operational.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please call me if you have any questions concerning this report at (618) 271-2804, Extension 101.

Sincerely,

  
James L. Gary  
General Manager

JLG/DW/jwk

cc: Mike Grant, IEPA - Collinsville  
Howard Chinn, Illinois Attorney General's Office  
Bob LaBoube, CWM - Midwest Region  
Ray Smiley, TWI  
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